

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

LAQUITA OLIVER and CHERELLE JACOB,  on behalf of themselves and all others similarly situated,  Plaintiffs,  v.  NAVY FEDERAL CREDIT UNION,  Defendant.	CASE NO. 1:23-cv-01731  CLASS ACTION
KRISTOFFER HICKS and MASHEESHA HOPPER,  on behalf of themselves and all others similarly situated,  Plaintiffs,  v.  NAVY FEDERAL CREDIT UNION and JOHN DOES 1-20,  Defendants.	CASE NO. 1:23-cv-01798  CLASS ACTION

**NOTICE OF ADDITIONAL RELATED ACTION FOR CONSOLIDATION**

On December 29, 2023, Plaintiffs in *Oliver et al. v. Navy Federal Credit Union*, Case No. 1:23-cv-01731 (“*Oliver Action*”) and *Hicks, et al., v. Navy Federal Credit Union, et al.*, Case No. 23-cv-1798 (the “*Hicks Action*”) jointly filed a Motion to Consolidate Actions and to Appoint Adam J. Levitt of DiCello Levitt LLP, Ben Crump of Ben Crump Law PLLC, and Hassan Zavareei of Tycko & Zavareei LLP as Interim Class Counsel. *Oliver* ECF Nos. 9, 10; *Hicks* ECF No. 5.

The *Oliver* and *Hicks* Actions are both putative class actions challenging Navy Federal Credit Union's discriminatory mortgage lending practices. *See Oliver* ECF No. 1; *Hicks* ECF No. 1.

On January 10, 2024, an additional putative class action, *Robinson et al. vs. Navy Federal Credit Union*, Case No. 1:24-cv-00049 ("*Robinson Action*"), was filed in this district that also challenges Navy Federal's discriminatory mortgage lending practices. *See Robinson* ECF No. 1. Given the substantial overlap between the factual allegations and legal theories in the *Oliver*, *Hicks* and *Robinson* Actions, for the reasons set forth in the existing Motion to Consolidate (*Oliver* ECF Nos. 9, 10; *Hicks* ECF No. 5), Plaintiffs in the *Oliver* and *Hicks* Actions respectfully request that the *Robinson* Action also be consolidated.

Plaintiffs in the *Oliver* and *Hicks* Actions have met and conferred with Plaintiffs in the *Robinson* Action and understand that the *Robinson* Plaintiffs will be filing an unopposed motion seeking consolidating of the *Robinson* Action with the *Oliver* and *Hicks* Actions and also support the appointment on Adam J. Levitt of DiCello Levitt LLP, Ben Crump of Ben Crump Law PLLC, and Hassan Zavareei of Tycko & Zavareei LLP as interim class counsel.

Dated: January 17, 2024

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